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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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MAZHAR SALEEM and JAGJIT SINGH, individually :	
and on behalf of all others similarly situated, :	
Plaintiffs, :	<b>ECF CASE</b>
- against - :	12 CV 08450 (JMF)
CORPORATE TRANSPORTATION GROUP, LTD., :	<b><u>AFFIDAVIT OF EDUARD SLININ</u></b>
et al., :	
Defendants. :	
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I, EDUARD SLININ, duly sworn, deposes and states:	

1. All of the statements in this affidavit are based on my personal knowledge as president, owner (either full or in part), and active “hands on” manager of all of the corporate entities in this lawsuit: Corporate Transportation Group, Ltd. (“CTG”); Corporate Transportation Group International; Corporate Transportation Group Worldwide, Inc.; NYC 2 Way International, Ltd. (“NYC2Way”); AllState Private Car & Limousine, Inc. (“AllState”); Aristacar & Limousine, Ltd. (“Aristacar”); TWR Car and Limo, Ltd. (“TWR”); Excelsior Car and Limo, Inc. (“Excelsior”); and Hybrid Express, Inc. (“Hybrid”).

2. On January 14, 2014, I submitted an affidavit in support of Defendants’ Motion For Summary Judgment in this matter (ECF No. 478). All statements in that affidavit were based

on my personal knowledge as president, owner, and active ‘hands on’ manager of the corporate entities in this lawsuit.

3. On February 4, 2014, I submitted an affidavit in opposition to Plaintiffs’ Motion For Partial Summary Judgment in this matter (ECF No. 500). All statements in that affidavit were based on my personal knowledge as president, owner, and active ‘hands on’ manager of the corporate entities in this lawsuit.

4. In paragraph 59 of my January 14, 2014 affidavit submitted in support of Defendants’ Motion for Summary Judgment, I included a chart showing which plaintiffs requested to be taken off of accounts and the number of accounts they requested to be taken off of. I do not keep a chart in this form in the ordinary course of business. Rather, a chart was created, in the form above, for the purposes of defending against this lawsuit.

5. Attached as Exhibit A to my January 14, 2014 affidavit submitted in support of Defendants’ Motion for Summary Judgment, is a chart showing which Plaintiffs own versus rent franchises. It is not a chart that is ordinarily kept in the course of business and was created for the purpose of this lawsuit.

6. To address Plaintiffs’ objection about the information in Exhibit A being in the form of a chart, the following is a list of the names of Plaintiffs who own franchises: Rafael Alesix Rijo; Ramon A. Almonte; Ahmed M. Bakier; Onris R. De La Rosa; Juan Delossantos; Shahidullah Dulal; Adel Elkazaz; Helena Elpidio; Marisol Espinal; Issa Feras; Alexis Garcia Alberto; Angel M. Gaya; Jack Golden; Ana M Herra; Xiong Jie Huang; Odishi Inc.; Ahmed Ismail; Shuhrat O Khakberdiyev; Anthony Khan; Oleg Kulyk; Ying Tian Lei; Samson Liao; Mei Yao Liu; Ubaldo De Los Santos; Robinson M. Mata; Christino Montero Sanchez; Andrzej Olechnowicz; Rafael Lorenzo Osoria; Lenkin R. Pantaleon; Peter G Panzica; Felix A Paulino;

Luis Perez; Pedro Moises Plasencia; Dexter Pusey; Hafjur Rahman; Tamer Rashdan; Ariel Restituyo; Bartolome Rosario; Katelyn Santos Baez; Alexander Schwalb; Mahammad Siddique; Juan A. Soto; Towon Leroy Stewart; Sheng Zhong Xu; Noble Young; Roxana Zetino-Beltran; Jorge Morales; Ratic Shivionov; Garnell WRIGHTEN; Keith J. Daniel; Wilson Antonio Santos; Xun Li Fan; Edgar Aucapina; Luis Aucapina; Arcelia Barros; Edisson Barros; Jose L. Cabrera; Felix Caraballo; Mikhail Gerber; Konstantin Katz; Adam Klag; Wilman Martnez; Pedro Pazmino; Marlene Pinedo; Wilson Antonio Santos; Mark Shinder; Balwinder Singh; Paul Gladkevitch; Point To Point Car & Limo Inc.; Rajan Dodeja; Paul Glibauskas; Eric Jarman; Ashwin Kumar; Dariusz Rydzewski; Nick Wijesinghe; Jan A. Kalda; Euclides Pena; Dexter Pusey; Md Khorshed Alam; Anjum Ali; Saad Attia; Fernando Avendano; Prakash Badlani; Kouri Baudwin; Anwar Bhatti; Carlota Briones; Jamshed Choudhry; Anowar Chowdhury; Ibrahim Desooki; Abdelilah El Karhat; Zydan Elnahar; Francois Fanfan; Asaad Faraj; Gustavo Garcia; Walid F. Hamcho; Jose Jaimes; Ramadan Kenawi; Wazir Mughal; Luis Perez; Gabriel Pizha; Imtiaz Quereshi; Mustapha Rahmouni; Mazhar Saleem; Mohammed Shamuddoha; Mohammad Siddiqui; Harnek Singh; Khushwant Singh; Kuldip Singh; Leo Stewart; Hasan Khalbash; Ijaz Mahboob; Atif Razaq; Gurmail Singh; Tarlochanpal Singh; Norman Levine; Jairo Bautista; Kerry Bobb; Jagdish Lal; Xiangbo Li; Liang Hua Ma; Fabian Martinez; Jose Mogrovejo; Harrikisoon Seejattan; Jose M. Solorzano; Miriam C. Solorzano; Luis M. Vasquez; Zenxin Wang; David A. Sanchez; and Norman Ho.

7. To further address Plaintiffs' objection about the information in Exhibit A being in the form of a chart, the following is a list of the names of Plaintiffs who rent franchises: Wei Xiong Ni; Cheung C Yeung; Xun Li Fan; Firoz Ahmed; Daniel Alexis; Donovan Anthony-James; Tahir Aziz; Prakash Badlani; Sameh S. Basily; Harvinder S. Bhamra; Shashi Kumar

Bhatia; Refat Bhuiyan; Ranjit Bhullar; Jimmy Chen; Man Cheng; Mohammad Choudhry; Jorge Contreras; Keith J. Daniel; Segundo F. Duman; Pedro Segundo Duman Quintuna; Xun Li Fan; Nwala Gabriel; Mohammed Gazi Ali; Anderson R. Gonzalez; Jeff Gravesande; Socrates Gregoriadis; Babar Hafeez; Kirk Anthony Hayden; John M. Hidalgo; Humayun Kabir Hussain; Malik Hussain; Mohammad M. Islam; Suleman Issi; Yasar Kahraman; Yasar Kahraman; Jawaid Masud Kayani; Avneet Koura; Munish Kumar; Wenzhong Li; Samson Liao; Maher Mohammad Maqsood; Marcos Mendez; Mohammed Mian; Mena Michael; Rangdev Multani; A Musa Mohammed; Ahmed Nisar; Bayram Onbasi; Ibrahim Onbasi; Wade Quashie; Mansoor Rana; Azid Riaz; Luis Sanchez; Irfan Shafi; Bhavesh Shah; Ke Shi; Inderjit Singh; Jagjit Singh; Jeewan Singh; Joginder Singh; Malook Singh; Maninder Singh; Satnam Singh; Sukh Devsingh; Tarlochanpal Singh; Sohan Singh Gill; Firozuddin Syed; Etienne Tchitchui; Nestor Teran; Vishamber Tukrel; Aziz Urrehman; Harnek Whar; Dongseog Yoo; Mikhail Zemka; Ai Nong Zhang; Zongrong Zhu; Amandeep Singh; Daljit Singh; Hafjur Rahman; Jose Mogrovejo; Mario Guerrero-Bajana; Rajan Kapoor; and Hilario A.Sanchez.

8. Attached as Exhibit B to my January 14, 2014 affidavit submitted in support of Defendants' Motion For Summary Judgment is a chart showing the number of jobs that were not serviced due to cancellation. This chart was created from data in CTG's dispatch system. It is not a chart that is ordinarily kept in the course of business. I directed that the chart be made for purposes of defending against this lawsuit.

9. In paragraph 62 of my January 14, 2014 affidavit submitted in support of Defendants' Motion for Summary Judgment, I included a chart showing which Plaintiffs were removed from accounts at a client's request between 2009 and 2012. I do not keep a chart in this

form in the regular course of business. The chart was created for purposes of defending against this lawsuit.

10. In paragraph 73 of my January 14, 2014 affidavit submitted in Support of Defendants' Motion for Summary Judgment, I included a chart showing which plaintiffs booked trips for personal customers and processed them through CTG's data processing service. I do not keep a chart of this form in the ordinary course of business. I created it for the purpose of defending this lawsuit.

11. To respond to Plaintiffs' objection in paragraph 174 of their Counterstatement of Material Facts, approximately 72 plaintiffs have never performed MTA work, including Saad Attia, Edgar Aucapina, Luis Aucapina, Fernando Avendano, Tahir Aziz, Kouri Baudwin, Harvinder S. Bhamra, Kerry Bobb, Felix Caraballo, Jorge Contreras, Juan De Dos Santos, Ibrahim Desooki, Rajan Dodeja, Adel Elkazaz, Francois Fanfan, Asaad Faraj, Mohammed Gazi Ali, Mikhail Gerber, Paul Gladkevitch, Jack Golden, Socrates Gregoriadis, Babar Hafeez, John M. Hidalgo, Humayun Kabir Hussain, Malik Hussain, Feras Issa, Suleman Issi, Jose Jaimes, Eric Jarman, Yasar Kahraman, Jan A. Kalda, Konstantin Katz, Ramadan Kenawi, Anthony Khan, Avneet Koura, Ashwin Kumar, Munish Kumar, Norman Levine, Fabian Martinez, Ismael Mejia, Michael Mena, Juan C. Mogrovejo, Jorge Monaks, Celstino Montero, Andrzej Olechnowicz, Ibrahim Onbasi, Euclides Pena, Luis Perez, Point To Point Car & Limo Inc., Mansoor Rana, Rafael A. Riso, David A. Sanchez, Mohammed Shamuddoha, Mark Shinder, Ratic Shivionov, Mohammad Siddiqui, Daljit Singh, Jagjit Singh, Jeewan Singh, Khushwant Singh, Satnam Singh, Sukhdev Singh, Taojochan Singh, Tarlochanpal Singh, Sohan Singh Gill, Jose Solore, Firozuddin Syed, Nestor Teran, Vishamber Tukrel, Aziz Urrehman, Garnell WRIGHTEN, and Cheung C Yeung.

12. I founded NYC2Way in or around 1985.

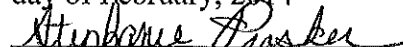
13. With respect to documents Bates numbered CTG 38263 and CTG 38264 (attached hereto as Exhibit A), I found these documents in mid-November while searching for documents pertaining to Joseph Maydwell, in response to a November 1, 2013 letter Plaintiffs sent my attorneys (attached hereto as Exhibit B). I did not find these documents prior to this date because they were not filed where they should have been because some of the documents in our office were misfiled after the office suffered significant damage in the wake of Hurricane Sandy in 2012. My attorneys produced these documents to Plaintiffs shortly after I gave them to my attorneys.

14. Approximately 15% of Defendants' business comes from requests from the general public, and approximately 85% comes from corporate accounts.

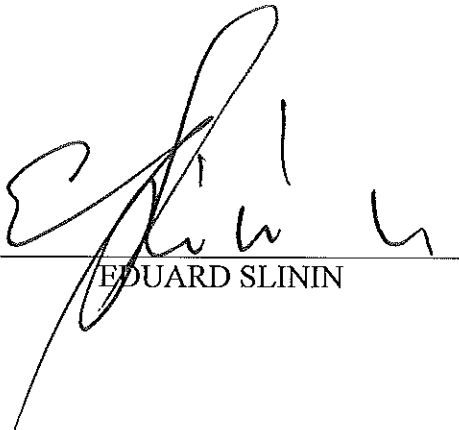
15. I declare under penalty of perjury that the foregoing is true and correct.

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Sworn to before me this 11th  
day of February, 2014

  
Notary Public

STEPHANIE PRASKER  
NOTARY PUBLIC, STATE OF NEW YORK  
No. 01PR4951343  
Qualified in Richmond County  
Commission Expires May 22, 2015

  
EDUARD SLININ